

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

WANDA OVALLES, INDIVIDUALLY : Case No. 3:14-CV-137-M-PAS
AND P.P.A A.O., AND WILSON OVALLES, :
 :
 :
Plaintiff, :
 :
 :
-v- :
 :
 :
SONY ELECTRONICS, INC., BEST BUY :
CO., INC., FOXCONN INTERNATIONAL, :
INC., AND JOHN DOE CORPORATIONS 1- :
4, :
 :
 :
Defendant. :
 :
 : _____, 2016

**PROPOSED ORDER GRANTING PLAINTIFFS' SECOND MOTION TO STRIKE
OBJECTIONS AND COMPEL SUPPLEMENTAL DISCOVERY RESPONSES
FROM SONY ELECTRONICS, INC.**

Upon review of Plaintiffs’ Second Motion To Strike Objections And Compel Supplemental Discovery Responses From Sony Electronics, Inc. (the “Motion”), as well as the supporting papers accompanying the Motion, and it appearing that proper notice of the Motion was provided to Defendant Sony Electronics, Inc. (“Sony Electronics”), and the Court having determined that there is good cause for granting the relief requested by Plaintiffs, including that Plaintiffs seek relevant documents in the possession, custody, or control of Sony Electronics, it is hereby **ORDERED:**

- 1) For the following requests, the Court's resolution of requests at issue in Plaintiffs' Motions To Compel (ECF 49, 41, 43) apply equally to requests at issue in Plaintiffs' Second Set of Requests for Documents;

Wanda Ovalles 2nd RFP No. 1
Wanda Ovalles 2nd RFP No. 2

Wanda Ovalles 2nd RFP No. 4
Wanda Ovalles 2nd RFP No. 5
Wilson Ovalles 2nd RFP No. 31

Wanda Ovalles 2nd RFP No. 17
Wilson Ovalles 2nd RFP No. 1
Wilson Ovalles 2nd RFP No. 64
Wilson Ovalles 2nd RFP No. 65

Wanda Ovalles 2nd RFP No. 10

Wanda Ovalles 2nd RFP No. 3
Wanda Ovalles 2nd RFP No. 16(a)
Wilson Ovalles 2nd RFP No. 7(b),(c),(d)
Wilson Ovalles 2nd RFP No. 8
Wilson Ovalles 2nd RFP No. 9(a),(b),(c)
Wilson Ovalles 2nd RFP No. 10(a),(b),(c),(g)
Wilson Ovalles 2nd RFP No. 11
Wilson Ovalles 2nd RFP No. 12
Wilson Ovalles 2nd RFP No. 13
Wilson Ovalles 2nd RFP No. 15
Wilson Ovalles 2nd RFP No. 19
Wilson Ovalles 2nd RFP No. 20
Wilson Ovalles 2nd RFP No. 21
Wilson Ovalles 2nd RFP No. 22
Wilson Ovalles 2nd RFP No. 23
Wilson Ovalles 2nd RFP No. 24
Wilson Ovalles 2nd RFP No. 25
Wilson Ovalles 2nd RFP No. 26
Wilson Ovalles 2nd RFP No. 28
Wilson Ovalles 2nd RFP No. 29
Wilson Ovalles 2nd RFP No. 30
Wilson Ovalles 2nd RFP No. 45
Wilson Ovalles 2nd RFP No. 46
Wilson Ovalles 2nd RFP No. 57

- 2) For the following requests, Sony Electronics shall identify all responsive documents Sony Electronics has produced, and shall produce of the documents Sony Electronics acknowledges are responsive but has not yet produced, within thirty days of this order;

Wanda Ovalles 2nd RFP No. 6
Wanda Ovalles 2nd RFP No. 7
Wanda Ovalles 2nd RFP No. 8
Wanda Ovalles 2nd RFP No. 9
Wanda Ovalles 2nd RFP No. 16(b), (c), (d)
Wanda Ovalles 2nd RFP No. 18
Wilson Ovalles 2nd RFP No. 3
Wilson Ovalles 2nd RFP No. 16
Wilson Ovalles 2nd RFP No. 17

Wilson Ovalles 2nd RFP No. 18
Wilson Ovalles 2nd RFP No. 27
Wilson Ovalles 2nd RFP No. 33
Wilson Ovalles 2nd RFP No. 34
Wilson Ovalles 2nd RFP No. 35
Wilson Ovalles 2nd RFP No. 42
Wilson Ovalles 2nd RFP No. 43
Wilson Ovalles 2nd RFP No. 44
Wilson Ovalles 2nd RFP No. 47
Wilson Ovalles 2nd RFP No. 48
Wilson Ovalles 2nd RFP No. 49
Wilson Ovalles 2nd RFP No. 50
Wilson Ovalles 2nd RFP No. 52
Wilson Ovalles 2nd RFP No. 53
Wilson Ovalles 2nd RFP No. 54
Wilson Ovalles 2nd RFP No. 55
Wilson Ovalles 2nd RFP No. 56
Wilson Ovalles 2nd RFP No. 67
Wilson Ovalles 2nd RFP No. 68
Wilson Ovalles 2nd RFP No. 69
Wilson Ovalles 2nd RFP No. 70
Wilson Ovalles 2nd RFP No. 71
Wilson Ovalles 2nd RFP No. 72
Wilson Ovalles 2nd RFP No. 73
Wilson Ovalles 2nd RFP No. 74

- 3) For the following requests, Sony Electronics shall particular the categories of communications that Sony Electronics claims privilege protection, within thirty days of this order;

Wilson Ovalles 2nd RFP No. 2
Wilson Ovalles 2nd RFP No. 58
Wilson Ovalles 2nd RFP No. 59
Wilson Ovalles 2nd RFP No. 60
Wilson Ovalles 2nd RFP No. 61

- 4) For the following requests, the objections are overruled and Sony Electronics shall produce all responsive documents, within thirty days of this order; and

Wanda Ovalles 2nd RFP No. 11
Wanda Ovalles 2nd RFP No. 12
Wanda Ovalles 2nd RFP No. 13
Wilson Ovalles 2nd RFP No. 32

Wilson Ovalles 2nd RFP No. 5
Wilson Ovalles 2nd RFP No. 6

Wilson Ovalles 2nd RFP No. 7(a)
Wilson Ovalles 2nd RFP No. 36

Wilson Ovalles 2nd RFP No. 37
Wilson Ovalles 2nd RFP No. 38
Wilson Ovalles 2nd RFP No. 39
Wilson Ovalles 2nd RFP No. 40

Wilson Ovalles 2nd RFP No. 62

- 5) Granting such other and further relief as the Court deems just and proper,
namely:

SO ORDERED
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